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TRIPLE D EXPRESS, INC.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RAMON FLORES, an Individual; SOCORRO  
FLORES, an Individual;

Plaintiffs,

vs.

VLADIMIR NASKOV ALEKSANDROV, an  
Individual; TRIPLE D EXPRESS, INC., an  
Illinois Corporation; DOES 1-X; and ROE  
BUSINESS ENTITIES XI-XX, inclusive,

Defendants.

CASE NO. 3:18-cv-00589-CBC

**ORDER SETTING DISCOVERY  
HEARING**

**STIPULATION FOR DISCOVERY HEARING**

IT IS HEREBY STIPULATED by and between the parties hereto, Plaintiffs, RAMON FLORES and SOCORRO FLORES, by and through their undersigned counsel, KIDWELL & GALLAGHER, LTD., and Defendants, VLADIMIR NASKOV ALEKSANDROV and TRIPLE D. EXPRESS, INC., by and through their undersigned counsel of record, THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER, pursuant to Local Rule 26-4 that a discovery hearing is requested with the Court.

STIPULATION FOR DISCOVERY HEARING  
Case No.: 3:18-cv-00589

Plaintiffs are Mexican citizens who formally resided in Elko, Nevada and are now residing in Mexico. The parties request this discovery conference in order to discuss with the Magistrate Judge the difficulty of scheduling discovery with Plaintiffs who are still working on getting their Permanent Resident Card renewed; Plaintiffs original interviews for said renewal were scheduled with the U.S. Consular Facility in Ciudad Juarez, Mexico for late March, however due to COVID-19, the interviews were cancelled. The immigration interview dates with the Consulate are now set for December 30, 2020 and January 4, 2021. This is the fourth time they have been re-scheduled by the Consulate. Plaintiffs advise that without this renewal they are unable to legally travel to Nevada to participate in discovery including their depositions and FRCP 35 examinations.

**IT IS SO STIPULATED.**

DATED this 11<sup>th</sup> day of September 2020.

DATED this 11<sup>th</sup> day of September 2020.

KIDWELL & GALLGHER, LTD.

THORNDAL ARMSTRONG DELK  
BALKENBUSH & EISINGER

/s/ Barbara W. Gallagher  
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**ORDER**

Based on the foregoing stipulation by the parties, the Court sets this matter for a video Discovery Conference on **Wednesday, September 30, 2020 at 11:00 a.m.**

IT IS SO ORDERED this 21st day of September, 2020.



CARLA BALDWIN  
U.S. MAGISTRATE JUDGE